

#### 2.9.2.4 Employment During Up-front Job Search

If an applicant finds unsubsidized employment during up-front job search, the FEP must place the applicant in the CMF placement or the prorated CSJ placement. ~~The FEP must first verify that the applicant has actually begun work and verify the wages and the number of expected hours worked per week prior to making a placement. (See 4.1.3)~~

If the applicant is working in unsubsidized employment for a total of 30 hours or more per week, the FEP must offer to place the applicant in CMF. If the applicant cannot obtain employment verification immediately, a FEP may use a participant's verbal statement to make the CMF placement, develop the EP, and assign case management activities. (See 7.2.3.1) In order to be placed in a CMF placement, the applicant must meet nonfinancial eligibility requirements. The FEP may exclude income and assets when determining CMF placement eligibility. (See 3.1 and 7.2.3.4)

If the applicant is working in unsubsidized employment less than 30 hours per week with limitations to increasing his or her work hours, the FEP must offer to place the individual in a prorated CSJ. The FEP must first verify that the applicant has actually begun work and verify the wages and the number of expected hours worked per week prior to making a prorated CSJ placement. (See 4.1.3) In order to be placed in a prorated CSJ placement, the applicant must meet all W-2 nonfinancial and financial eligibility requirements. (See Chapters 2 and 3 and 7.4.1.4)

- **Note:** Case closure policies in Section 11.4.1 for failing to verify eligibility information do not apply to W-2 applicants. The case closure policies only apply to W-2 participants in open and ongoing W-2 cases.

**EXAMPLE 1:** Joseph has a history of employment as a marble finisher; however, his employer of five (5) years went out of business. Joseph has a high school diploma, a valid driver's license, and owns a vehicle. He meets with the FEP on the fourth working day of up-front job search and informs the FEP that he had an interview with a local manufacturing company and was offered a full-time position starting the following business day. Joseph informs the FEP of his employment and the employment start date. The FEP requests that Joseph submit employment verification within seven working days and the FEP proceeds with an informal assessment resulting in few to no known barriers to employment identified. On the 10th day the FEP receives employment verification that Joseph began working 40 hours per week. After running eligibility, the FEP determines that Joseph is appropriate for CMF because Joseph meets all of the nonfinancial eligibility requirements.

**EXAMPLE 2:** ~~Tatiana has a work history of completing short-term temporary assignments in production lasting no more than one month at a time. Tatiana does not have her high school diploma and would like to pursue a career in child care as she likes working with children. She meets with the FEP on the second working day of up-front job search and informs the FEP that she was offered and has accepted a position as a cleaner working 20 hours per week starting the following Monday. The FEP requests Tatiana submit employment verification within seven working days. Upon receiving the employment verification, the FEP determines that Tatiana is appropriate for 1/3 CSJ because Tatiana does not have a high school diploma and has a sporadic work history.~~

### 3.1 General Financial Eligibility

In addition to meeting the nonfinancial eligibility criteria, applicants must also meet financial eligibility criteria to be considered eligible for W-2 services or a JAL. W-2 financial eligibility is determined by both a gross income and an asset test.

~~There is one exception to this as a Minor Parent is eligible for case management services without regard to income or assets.~~

There are two exceptions to this:

- A Minor Parent is eligible for case management services without regard to income or assets.
- Participants in a CMF placement do not have to meet the financial eligibility requirements. CMF participants must meet nonfinancial eligibility requirements in order to be eligible for ongoing case management services.

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#### 4.6.1 Relocation into or out of Milwaukee County or Between Balance of State W-2 Agencies

W-2 participants who relocate into Milwaukee from the BOS must reapply at the W-2 agency serving the address to which they have relocated.

W-2 participants who relocate out of Milwaukee into the BOS or between BOS W-2 agencies must reapply at the W-2 agency that serves the county into which the individual has relocated. The individual may reapply at any of that agency's office locations. However, the agency must enroll the applicant in the W-2 Eligibility and Work Program offices for the county in which the applicant now resides.

Any time a participant relocates and will be served by a new W-2 agency, the outgoing W-2 agency must determine when to end-date the employment position according to the needs of the participant, W-2 employer/work training provider, and agency.

If a participant in a CMF placement relocates into or out of Milwaukee or between BOS W-2 agencies, the participant cannot be enrolled into the incoming agency, nor may the participant remain in an open placement with the current W-2 agency. The CMF placement may not transfer and must be closed at the originating agency when the participant leaves the county. The FEP at the originating agency must close the CMF placement and end the W-2 episode. If the individual loses the employment that led to the CMF placement while enrolled in W-2, the individual may reapply for W-2 in the county where the individual has relocated.

To end the employment position, the outgoing agency must end-date the placement on ~~CARES Screen WPWW-CWW W-2 Placements page~~ so that CARES will generate the final payment for activities completed during the last participation period. The outgoing agency must also end all activities on CARES screen WPCH and disenroll the case from the CARES Work Programs subsystem.

The incoming agency must treat the individual as an applicant. (See 1.4.4) When deciding on services for the individual, the incoming agency should consider the individual's past W-2 experience, including prior placements.

For more information on CARES processing and functionality, including how to end W-2 eligibility and close the W-2 case, see Operations Memos 12-65 and 13-09.

### **7.2.2 Individuals Working in Unsubsidized Employment Case Management Underemployed (CMU)**

The CMU placement is for applicants entering the W-2 program who are working full-time or who are working part-time and who do not have any barriers to full-time employment. The goal of CMU is to give participants the assistance they need to stay employed and advance in their careers. FEP may place applicants with farming and self-employment income in a CMU.

Participants may stay in CMU as long as they are working, do not have barriers to full-time employment, and meet financial and nonfinancial eligibility requirements. FEPs must not place marginally employed applicants in a CMU. Depending on the individual's specific circumstances, the agency may place a marginally employed applicant in a W-2 T, CSJ, or pro-rated CSJ placement.

The initial assessment, including determining CMU placement eligibility and employability planning, must be conducted in person. However, after an individual is placed in a CMU placement, and that individual has a work schedule that makes it difficult to come into the office for a face-to-face EP appointment, the agency may conduct the ongoing EP and eligibility review appointments by phone. Ongoing case management services may be conducted by phone for participants in CMU and CMF placements only. (See 6.2.2).

CMU is not for ongoing W-2 participants who find employment. The appropriate placement for these individuals is CMF. (See 7.2.3)

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### **7.2.3 Employed Individuals Previously Assigned to a Subsidized Employment Position Case Management Follow-up (CMF)**

#### **7.2.3.1 General CMF Participant Description Characteristics**

#### **7.2.3.2 Case Management Services for CMF Participants**

#### **7.2.3.3 Job Loss and CMF**

#### **7.2.3.4 CMF Eligibility Requirements**

The CMF placement is for on-going W-2 Participants who find employment while in W-2 who were previously in a paid placement are eligible for CMF services; this includes TEMP, CSJ, W-2 T, and CMC. The goal of CMF is to give participants the assistance they need to stay employed and advance in their career. W-2 agencies are expected to provide 12 months of follow-up services as long as CMF participants continue to meet the nonfinancial eligibility requirements. W-2 case management services can be provided even after the CMF participant loses nonfinancial and/or financial eligibility. There is no time limit to CMF services and the W-2 agency may provide these services as long as the participant is interested. CARES will close CMF cases at the end of 12 months. If a CMF placement lasts less than 12 months, the FEP must document the reason(s) in case comments. If a participant wishes to receive case management services beyond the 12 months allowable in a CMF placement, the FEP may change the participant's placement to CMU if the participant meets financial and nonfinancial eligibility requirements.

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#### **7.2.3.1 General CMF Participant Description Characteristics**

Participants who were previously in a paid placement are eligible for CMF services; this includes TEMP, CSJ, W-2 T, and CMC. In addition, W-2 applicants in up-front job search and the Case Management for

Job Ready (CMJ) and Case Management Denied (CMD) placement who find unsubsidized employment are eligible for CMF services. ~~Prior to placing an individual in CMF, the FEP must verify that the applicant or participant is working and verify the wages and the number of expected hours worked per week.~~

When a participant reports starting a new job, a FEP can use a participant's verbal statement to change the placement to CMF, revise the EP, and assign case management activities. While waiting for the verification, the FEP must gather as much information as possible from the participant, including the name and address of the employer, the expected begin date of employment, the hourly wage, and number of expected hours of work per week. The FEP must enter the new verified or unverified employment information on the CARES screen WPEH and the CWW Employment Page. If the information is unverified, the FEP must return to WPEH and the Employment Page to update the employment information when the verification is received.

See the Desk Aid "Changing W-2 Placements" for instructions.

*No change to remainder of 7.2.3.1*

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### **7.2.3.2 Case Management Services for CMF Participants**

The W-2 agency must offer CMF services for ~~at least~~ 12 months. During the 12-month period, the FEP must provide appropriate services and maintain regular contact; most CMF participants should receive bi-weekly or no less than monthly contact.

Activities provided through case management services may include:

- Job Retention Services (JR);
- Literacy Skills (LS);
- Vocational Literacy Skills (VL);
- Vocational Adult Basic Education (VA);
- English as a Second Language (EL);
- Vocational English as a Second Language (VE);
- Adult Basic Education (BE);
- General Educational Development (GE);
- High School Equivalency Diploma (HE);
- Working Full-Time (WF); or
- Working Part-Time (WP).

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### **7.2.3.3 Job Loss and Reduction in Hours in CMF**

If a participant in a CMF placement loses his or her job or experiences a reduction in work hours, the FEP must reassess the individual to determine if there are possible unidentified barriers.

For a job loss, if the FEP suspects that there are additional barriers, the FEP must place the individual in the appropriate paid placement (TEMP, CSJ, or W-2 T) if the participant meets financial and nonfinancial eligibility criteria, and offer a formal assessment and other appropriate services.

If the FEP does not suspect that there are additional barriers and the FEP determines that the individual is capable of obtaining additional employment, a CMJ placement may be appropriate. (See 7.2.4)

If a reduction in hours results in less than 30 hours per week and the individual has limitations to increasing his or her work hours, the FEP must place the individual in a prorated CSJ. The FEP must assign activities specifically designed to assist the participant to increase his or her work hours or to obtain full-time employment. If the FEP does not suspect that there are additional barriers, the FEP must keep the participant in the CMF placement.

- NOTE: In order for a participant to move from a CMF placement to a TEMP, CSJ, prorated CSJ, W2-T, or CMJ placement, the participant must meet all financial and nonfinancial eligibility requirements.

**EXAMPLE 1:** Barbara is in a CMF placement and has been working full-time for 90 days as a cashier. Barbara informs her FEP that her work hours have been reduced to part-time. The FEP reviews Barbara's paystubs for the last 30 days showing an average of 15 hours worked per week. The FEP verifies with the employer that Barbara's hours have been reduced to part-time due to the end of the holiday season and the employer does not expect that her hours will increase to full-time until the next holiday season. The FEP meets with Barbara, completes an informal assessment, and determines that she meets nonfinancial and financial eligibility in order to move from a CMF placement to a prorated paid placement. ~~and completes an informal assessment.~~ Barbara enjoys working with customers. Barbara does not have a resume and prefers to complete paper applications as she has minimal computer skills. The FEP places Barbara in a 1/2 CSJ and assigns activities that will help Barbara find other full-time employment, including ~~The FEP schedules Barbara for a workshop on resume writing and successful employment search.~~ The FEP also arranges for Barbara to attend the on-site computer lab on her off hours to work on her typing skills. The FEP provides Barbara with information on an upcoming job fair hiring for various entry-level positions and supplies Barbara with blank applications for greeter positions with two local retail stores. The FEP maintains bi-weekly contact with Barbara to monitor her progress. ~~While Barbara is making progress with her typing skills, the FEP determines that Barbara will not be able to increase her work hours because she lacks some of the skills needed for a successful job search. The FEP places Barbara in 1/2 CSJ.~~

*No change to remainder of 7.2.3.3*

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#### **7.2.3.4 CMF Eligibility Requirements (New Section)**

W-2 participants that have obtained unsubsidized employment may transition from a paid placement to a CMF placement and are eligible for case management follow-up services only if they continue to meet all nonfinancial eligibility requirements. When determining CMF eligibility, the FEP must exclude income and assets.

If an individual who is transitioning from a paid placement to a CMF placement has a work schedule that makes it difficult to come into the office for face-to-face eligibility reviews and EP appointments, the agency may conduct the appointments by phone. (See 6.2.1 and 6.2.2)

**EXAMPLE 1:** Caitlyn has one child and was in a CSJ placement for four months. She began a new job that pays \$10 an hour for 40 hours per week. At the EP appointment, the FEP verifies her employment and wages and changes her placement to CMF. Based on her W-2 group size and income level, Caitlyn no longer meets the financial eligibility requirement for most W-2 services; however, CMF placements exclude income and assets when determining eligibility. Caitlyn continues to meet all of the nonfinancial eligibility requirements listed in W-2 Manual 2.2.1. Therefore, she is eligible for case management follow-up services.

**EXAMPLE 2:** Ben has custody of his two minor children and has been working as a mechanic for six months. The FEP changed his W-2 placement to CMF when Ben originally reported his employment when he started working. The FEP completes a six-month eligibility review over the phone with Ben. During the review, Ben tells the FEP that his former spouse regained custody of both children last month. The FEP will end Ben's CMF placement because he no longer meets the W-2 nonfinancial eligibility requirements. The FEP will close Ben's W-2 case, disenroll from Work Programs, and enter in case comments the reason why Ben's CMF placement is less than 12 months.

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#### 7.2.4.8 Ending CMJ Placements

CMJ participants who obtain employment must be offered employment retention and advancement services in a CMF placement. CMJ participants are required to meet all financial and nonfinancial eligibility requirements. Participants in a CMF placement are only required to meet nonfinancial eligibility requirements. When in a CMJ placement, the FEP must close a participant's case if the participant fails to cooperate with specific W-2 program requirements without good cause. (See 11.4) If a participant in a CMJ placement is not cooperating with ongoing job search activities, the FEP must address this at the weekly meetings.

*No change to remainder of 7.2.4.8*

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#### 7.2.5 Denying or Terminating an Unsubsidized Employment Case Management Placement

If any individual placed in a CMD, CMU, CMF, or CMJ declines case management services or does not participate, the FEP must terminate eligibility for the placement. CWW will issue a W-2 denial notice. If the participant refuses case management services, the FEP must document the refusal on CARES screen CMCC.

As case management placements, there is no hourly payment reduction for non-cooperation in CMD, CMU, CMF, or CMJ. However, the FEP may close a CMD or CMJ placement if the individual is not cooperating with job search requirements, fails to come in for his or her EP review appointment, or loses contact with the FEP. If a CMU or CMF participant fails to come in or call in to his or her EP or eligibility review appointment or loses contact with the FEP, the FEP should close the CMF or CMU placement. Eligibility reviews must be conducted at least every six months to maintain nonfinancial eligibility.

In addition, job refusal could affect future W-2 eligibility. (See 180 day policy - Manual Section 2.2.1)

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#### 17.2.2 Eligibility Determination Process

*The only change in this section is to the note.*

- **Note:** Individuals remain eligible for a CMF placement even after their income and assets exceed W-2 limits. All CMF cases must meet nonfinancial eligibility requirements to continue receiving case management services. ~~For these individuals, W-2 eligibility will end while their CMF~~

placement continues. If a JAL applicant is in CMF and is not open for W-2 eligibility on CWW, the FEP must run W-2 eligibility as part of the JAL application process.